

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

STEVEN G. MILLETT, MELODY J. MILLETT, )  
On Behalf Of Themselves and All Others )  
Similarly Situated, )

Plaintiffs, )

v. )

TRUELINK, INC., )  
A Trans Union Company, )

Defendant. )

Case No. 05-599-SLR

**RESPONSE TO PLAINTIFFS' FIRST INTERROGATORIES  
TO DEFENDANT TRUELINK, INC.**

Defendant TrueLink, Inc., now known as Trans Union Interactive, Inc. ("TrueLink"), by its attorneys, hereby responds to Plaintiffs' First Interrogatories to Defendant TrueLink, Inc.

**GENERAL OBJECTIONS**

1. TrueLink objects to the definition of "Customers," as overly broad, unduly burdensome, and seeks information that is neither relevant to the claims or defenses of any party in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence insofar as the definition includes persons who purchased Credit Monitoring from Trans Union, LLC.

2. TrueLink objects to the definition of "identify" and "identification" as overly broad and unduly burdensome.

**RESPONSES TO INTERROGATORIES**

1. Please identify the division(s) or group(s) responsible for marketing Credit Monitoring and the person(s) who are in charge of those division(s) or group(s).

**RESPONSE:** Subject to and without waiving the foregoing General Objections, TrueLink identifies the following division and individuals: TrueLink's Marketing Group, including Lucy Duni, Director of Marketing (San Luis Obispo, CA).

2. Please identify the division(s) or group(s) that are responsible for the design and/or development of Credit Monitoring and the person(s) who are in charge of those division(s) or group(s).

**RESPONSE:** Subject to and without waiving the foregoing General Objections, TrueLink identifies the following division and individuals: TrueLink's Product Management Group, including Lucy Duni and Justin DePow (San Luis Obispo, CA).

3. Please identify, by date and method of distribution, all advertising or Marketing Materials that have been used at any time to market or advertise Credit Monitoring by any media including print, broadcast and internet/email.

**RESPONSE:** TrueLink objects to Interrogatory No. 3 to the extent that it is overly broad and unduly burdensome. Subject to and without waiving the foregoing General Objections and specific objections, and pursuant to Federal Rule of Civil Procedure 33(d), TrueLink will produce documents containing responsive information. TrueLink further directs Plaintiffs' counsel to documents previously produced by TrueLink in this action and numbered TL000001 through TL000131.

4. When was Credit Monitoring first offered for sale?

**RESPONSE:** Subject to and without waiving the foregoing General Objections, TrueLink first offered Credit Monitoring for sale on or about July 29, 2001.